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VIA ECF

Hon. James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Bedoya v. NYC Citrus LLC, et al. (20-cv-548)(EK)(JRC)
Letter to the Court

Dear Judge Cho,

We represent Defendants in the above-referenced matter. In advance of the status conference scheduled for November 3, 2021 at 2:00pm, Defendants would like to notify the Court that Defendants may request an extension of the fact discovery deadlines at the status conference. The Court previously ordered all discovery to be completed by November 1, 2021. Defendants may respectfully request that the fact discovery deadline be extended until and including December 1, 2021. This would be the second request for an extension of the fact discovery deadline.

A mediation before the Court was previously scheduled for November 4, 2021. In a letter filed with the Court on October 28, 2021, Defense counsel explained that Defense counsel requested a mediation prior to receiving approval from Defendants, and subsequently, Defendants believe that a mediation before the Court would not currently be fruitful. In light of the cancelled mediation, Defendants may request a brief extension of the fact discovery deadline to resolve any outstanding discovery.

We thank the Court for its time and attention.

Respectfully submitted,
/s/ Joey Tsai
Joey Tsai
Attorney for Defendants

cc: Amit Kumar, Esq. (VIA ECF)